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Date: DECEMBER 9, 2005

To: EXAMINER GARG, YOGESH  
U.S. PATENT AND TRADEMARK OFFICE

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Client/Matter No.: AUS920010193US1 (9000/34)

# of Pages: 17  
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	Application Number	09/821,066
	Filing Date	MARCH 29, 2001
	First Named Inventor	KEITH K. T. HO
	Group Art Unit	3825
	Examiner	GARG, YOGESH C

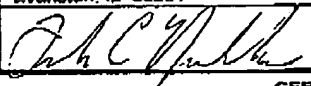
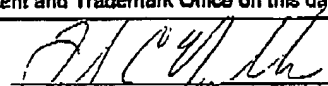
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Indep.		Minus		0	x \$100=	0		x \$200=	
First Presentation of Multiple Dep. Claim					+ \$180=	—		+ \$360=	
					total add'l fee			total add'l fee	
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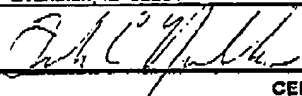
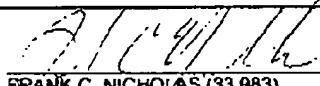
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	Application Number	09/821,066
	Filing Date	MARCH 29, 2001
	First Named Inventor	KEITH K T HO
	Group Art Unit	3625
	Examiner	GARG, YOGESH C.

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First Presentation of Multiple Dep. Claim					+ \$180=	---		+ \$360=		
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FRANK C. NICHOLAS (33 983)

Name of Appellant, assignee or registered representative



Signature

December 9, 2005

Date of Signature

PATENT  
Case No. AUS920010193US1  
(9000/34)

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:

KEITH K.T. HO

Serial No.: 09/821,066

Filed: MARCH 29, 2001

For: METHOD AND SYSTEM FOR  
INVENTORY MANAGEMENT

Examiner: GARG, YOGESH

Group Art Unit: 3625

Conf. No.: 5343

APPEAL BRIEFCommissioner for Patents  
P.O. Box 1450  
Alexandria, VA 22202-1450

Dear Sir:

Appellants respectfully present their Brief on Appeal as follows:

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**1. REAL PARTY IN INTEREST**

The real party in interest is assignee INTERNATIONAL BUSINESS MACHINES CORPORATION, a corporation organized and existing under the laws of the State of New York, USA and located at New Orchard Road, Armonk, New York 10504, USA

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2. **RELATED APPEALS AND INTERFERENCES**

Appellant and the undersigned attorneys are not aware of any appeals or any interferences which will directly affect or be directly affected by or having a bearing on the Board's decision in the pending appeal.

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**3. STATUS OF CLAIMS**

Claims 1 - 16 are currently pending in the application and stand finally rejected. No claim amendments have been made, and no amendments have been entered. Claims 1-16 were rejected under 35 U.S.C. §102(e) as anticipated by Scheer, United States Patent Application Publication 2002/0143669. All claims are on appeal. See, the Appendix.



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**4. STATUS OF AMENDMENTS**

All amendments to the specification have been entered, including an amendment to the drawings and an amendment to the Abstract.

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**5. SUMMARY OF CLAIMED SUBJECT MATTER**

The invention provides a method of grouping parts in inventory. The method includes defining a database 22 for indicating 30 functional relationships between a plurality of parts and searching 54/58 the database 22 to identify one or more groups 60 of functionally interchangeable parts. See FIGS. 1-4, and pages 4-7 of the specification.

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6. **GROUND OF REJECTION TO BE REVIEWED ON APPEAL**

Were claims 1-16 properly rejected under 35 U.S.C. §102(e) as anticipated by Scheer,  
US Patent Application Publication 2002/0143669?

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**7. ARGUMENTS**

**A. Claims 1-16 were rejected under §102(e) as anticipated by Scheer**

The rejection under §102(e) as anticipated by Scheer is traversed. In order to maintain this anticipation rejection, each and every claim element must be disclosed by the reference in as great detail as claimed. Scheer fails to disclose at least “defining a database for indicating functional relationships between a plurality of parts; and searching the database to identify one or more groups of functionally interchangeable parts” as claimed in claims 1, 6, and 13. At most, Scheer discloses that an agent may determine if a distributor has access to any equivalent products. See, Scheer, para. 0147. Scheer does not disclose the existence of *any database for indicating functional relationships between a plurality of parts*. Therefore, Scheer cannot anticipate claims 1, 6 or 13.

Furthermore, since Scheer does not disclose a database indicating functional relationships between a plurality of parts, Scheer likewise cannot disclose searching the database, as further claimed in claims 1, 6, and 13.

Additionally, Scheer does not disclose “defining a first table identifying a plurality of parts; defining a second table, associated with the first table, indicating functional relationships between the parts; and recursively searching the first and second tables to generate [a] list of interchangeable parts” as claimed in claim 3. Claims 4 and 5 depend directly or indirectly from claim 3 and are therefore allowable over Scheer for at least the same reasons.

Claims 2, 7-12, 14 and 16 depend directly or indirectly from claims 1, 6, and 13 and are therefore allowable over Scheer for at least the same reasons

Withdrawal of the rejections to claims 1-16 is requested.

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**CONCLUSION**

The Appellants respectfully submit that claims 1-16 fully satisfy the requirements of 35 U.S.C. §§102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested.

Dated: **December 9, 2005**

Respectfully submitted,  
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## CLAIMS APPENDIX

1. A method of grouping parts in inventory, comprising:  
defining a database for indicating functional relationships between a plurality of parts; and  
searching the database to identify one or more groups of functionally interchangeable parts.
2. The method of claim 1, wherein the step of searching includes:  
repeatedly searching the database to produce a list of parts that can be used interchangeably.
3. A method of generating a list of interchangeable parts, comprising:  
defining a first table identifying a plurality of parts;  
defining a second table, associated with the first table, indicating functional relationships between the parts; and  
recursively searching the first and second tables to generate the list of interchangeable parts.
4. The method of claim 3, further comprising:  
receiving a part identifier.
5. The method of claim 4, wherein the step of recursively searching includes:  
applying the part identifier to the first table to retrieve a functional relationship from the second table, the functional relationship specifying an additional part identifier; and  
applying the additional part identifier to the first table to retrieve an additional functional relationship from the second table.

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6. A parts inventory system, comprising:  
a database for indicating functional relationships between a plurality of parts;  
and  
a search engine for searching the database to identify one or more groups of functionally interchangeable parts.
7. The parts inventory system of claim 6, wherein the database includes:  
a first table identifying the parts; and  
a second table, associated with the first table, indicating the functional relationships between the parts.
8. The parts inventory system of claim 7, wherein the search engine recursively searches the first and second tables to generate the list of interchangeable parts.
9. The parts inventory system of claim 7, wherein the search engine includes:  
means for applying a part identifier to the first table to retrieve a functional relationship from the second table, the functional relationship specifying an additional part identifier; and  
means for applying the additional part identifier to the first table to retrieve an additional functional relationship from the second table.
10. The parts inventory system of claim 6, further comprising:  
an input interface for receiving a part identifier.
11. The parts inventory system of claim 6, further comprising:  
a network interface permitting remote users to generate a list of interchangeable parts.

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12. The parts inventory system of claim 6, further comprising:  
a remote workstation for communicating with the search engine over a communication network.
13. A computer program product in a computer-usable medium, comprising:  
means for defining a database for indicating functional relationships between a plurality of parts; and  
means for searching the database to identify one or more groups of functionally interchangeable parts.
14. The computer program product of claim 13, wherein the searching means includes:  
means for repeatedly searching the database to produce a list of parts that can be used interchangeably.
15. The computer program product of claim 13, comprising:  
means for defining a first table identifying the parts;  
means for defining a second table, associated with the first table, indicating the functional relationships between the parts; and  
means for recursively searching the first and second tables to generate a list of the interchangeable parts.
16. The computer program product of claim 15, further comprising:  
mean for applying a part identifier to the first table to retrieve a functional relationship from the second table, the functional relationship specifying an additional part identifier; and  
means for applying the additional part identifier to the first table to retrieve an additional functional relationship from the second table.



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**EVIDENCE APPENDIX**

Appellants entered no evidence pursuant to §1.130, 1.131 or 1.132, and the Examiner entered no evidence that was relied upon by Appellants.

**RELATED PROCEEDINGS APPENDIX**

There are no copies of related decisions or proceedings.